

3:25-mj-00114

DISTRICT OF OREGON, ss: AFFIDAVIT OF AARON T. EISNER

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Aaron T. Eisner, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since 2011. I am currently assigned to the FBI's Portland field office. My current assignment involves investigating child exploitation crimes. My training and experience includes investigating federal criminal violations related to child exploitation, among other violations of federal law. I have acquired knowledge and experience in conducting criminal investigations from formal and informal training, learning from other law enforcement officers, and my participation in investigations.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for **Michael Joseph Cambalik**. As set forth below, there is probable cause to believe, and I do believe, that Cambalik committed Sexual Exploitation of a Minor, in violation of 18 U.S.C. § 2251(a), Receipt of Child Pornography in violation of 18 U.S.C. § 2252A(a)(2), and Coercion and Enticement in violation of 18 U.S.C. § 2422(b).

Applicable Law

3. Title 18, United States Code, Sections 2251(a) make it a crime to knowingly persuade, induce, entice, or coerce any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction

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was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, or attempts to do so.

4. Title 18, United States Code, Section 2252A(a)(2) makes it a crime to knowingly receive or distribute any child pornography using any means or facility of interstate or foreign commerce, or that has been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

5. Title 18, United States Code, Section 2422(b) makes it a crime for whomever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so.

Statement of Probable Cause

6. On or about December 21, 2024, the parents of Minor Victim, herein referred to as MV, date of birth XX/XX/2015, contacted the Plano, Texas Police Department (PPD) after believing they found child sexual abuse material (CSAM) of MV on MV's cellular phone. The parent of MV reported that MV sent the CSAM of MV via text message to phone number XXX-309-XXXX¹. The user of phone number XXX-309-XXXX was unknown to the parent of MV.

¹ The user of XXX-309-XXXX is assessed to be Michael Joseph Cambalik.

Additionally, MV's parent advised that MV utilized the Call of Duty² mobile application to speak with individuals online. The parent of MV believed that was how MV first came into contact with the user of phone number XXX-309-XXXX online. The parent advised that MV used MV's iPad to play Call of Duty mobile. PPD collected MV's cellular phone and iPad.

7. Due to the MV's family residing in Texarkana, Texas, the PPD report was referred to the Texarkana Police Department (TTPD) for further investigation.

8. On or about January 30, 2025, TTPD conducted a digital extraction of MV's cellular phone. On or about January 31, 2025, the digital extraction was provided to the FBI. On or about February 11, 2025, MV was forensically interviewed at the Texarkana Children's Advocacy Center by an FBI Child Adolescent Forensic Interviewer (CAFI).

9. During the forensic interview, MV stated he knew he was being interviewed to speak about his phone and his tablet. MV could not remember the date of the messages but believed it was in 2024 and occurred over about five days. MV was playing Call of Duty and asked other individuals playing if they were a girl. A user replied saying the user was a girl. This user provided MV with a phone number for MV to communicate with the user.

10. The CAFI asked MV what was talked about regarding age between MV and the user of phone number XXX-309-XXXX. MV's response is partially muffled but MV appears to state – I don't, I was nine, and I don't know how old was [sic] the person. Later in the forensic interview the CAFI asks a clarifying question to MV to confirm that the user of phone number XXX-309-XXXX knew that MV was nine. MV makes a positive affirmation to this question

² Call of Duty is a military first-person shooter video game series and media franchise published by Activision. The game offers online play, where users are able to play with other online users, as well as exchange direct messages.

from the CAFI.³ The user asked MV to take photographs of MV's body, to include photographs of MV's private parts. MV took photographs using his cellular phone and sent them through text message to the user's phone number.

11. During the forensic interview, MV was shown portions of the text message conversation that occurred between MV and the user of XXX-309-XXXX. The conversation was obtained from the forensic extraction of MV's phone. MV identified himself as one of the participants in the text exchange and the "girl" as the other user.

12. MV estimated he sent approximately 30 photographs and 1-3 videos.

13. A review of the digital extraction of MV's cellular phone identified that MV exchanged text messages with the user of XXX-309-XXXX, believed to be Cambalik, beginning on or about December 4, 2024. The final message sent by XXX-309-XXXX to MV occurred on or about December 6, 2024. The final message sent by MV to XXX-309-XXXX occurred on or about December 19, 2024. Below is a portion of the exchange that demonstrates XXX-309-XXXX attempted to, and succeeded at, obtaining nude images from MV:⁴

³ TTPD subpoenaed records from Activision related to MV's Call of Duty account and a Call of Duty Account believed to be used by Cambalik, that included a request for content. Activision's response included the content of chat communications conducted over the platform. I do not include any of that information, or anything derived from that information, in this affidavit to support probable cause. However, because I included reference to an interview in which MV seemingly identified himself as nine years old and stated he did not know the age of the individual with whom he was talking, I alert the Court that data produced by Activision included information inconsistent with that statement, namely chats in which MV identified himself as ten years old and the user, believed to be Cambalik, identified herself/himself as "11 F".

⁴ Excerpts of text messages included in this warrant are summaries. Certain messages have been excluded, as signified by an ellipsis or bracketed language, for brevity and to protect the ongoing investigation.

MV: Let me see a picture of you

XXX-309-XXXX: But I'm in bed

MV: Go to the bathroom. Yes, Shut the door and tur on

XXX-309-XXXX: But I'm dressed for bed

XXX-309-XXXX: Fine but you first

[Later in the chat]

MV: [Image of MV standing with his pants down around his knees and his penis exposed]

MV: It is your turn to do it

XXX-309-XXXX: Babe take everything off

MV: Ok

XXX-309-XXXX: Your so big baby

MV: Ok

MV: [Image of MV standing fully nude with his penis exposed]

XXX-309-XXXX: Wow baby

[Later in the chat]

MV: Let me see in front of you

XXX-309-XXXX: Wow baby

MV: Naked

XXX-309-XXXX: But I've never done that before

MV: Just do it i love so much

XXX-309-XXXX: Look at the chat babe

MV: OK

XXX-309-XXXX: Your eyes are so pretty babe

MV: Thank you just take the picture

XXX-309-XXXX: I'm not so comfy yet it's my first time

MV: Ok

XXX-309-XXXX: Can I get to know you some more first please

XXX-309-XXXX: I'll get comfy I promise

MV: Yes do it

XXX-309-XXXX: I want to see you closer cause it's so big

MV: What is big

XXX-309-XXXX: You know

[Later in the chat]

MV: [Approximately 50 second video of MV in a bathroom. MV's penis is visible in portions of the video.]

MV: Yaas

MV: Take a picture of your boobs

[Later in the chat XXX-309-XXXX references specific content in the 50 second video, asking MV a question about the content, indicating XXX-309-XXXX has in fact viewed the video]

14. The digital extraction of MV's cellular phone identified there were approximately ten images sent by MV to Cambalik. Approximately five of these images contained CSAM. There were approximately 13 videos sent by MV to Cambalik. Approximately ten of these videos contained CSAM. Some of the images and videos sent by MV to Cambilik appeared to be duplicates.

15. Open-source research identified that phone number XXX-309-XXXX was provided by Bandwidth.com, Inc. The FBI subpoenaed Bandwidth.com, Inc for phone number XXX-309-XXXX. On or about February 6, 2025, Bandwidth responded by saying XXX-309-XXXX was on the Bandwidth network; however, the number was assigned to Google, Inc. The FBI subsequently sent a subpoena to Google for number XXX-309-XXXX. The FBI received responsive information to the subpoena on or about February 21, 2025. Google's response identified that Google Voice Number XXX-309-XXXX was associated with Google Account 736514482039. The Google Voice Subscriber Status was listed as ACTIVE and the start date was listed as October 10, 2015. The last outbound SMS was listed as being sent on or about February 19, 2025. Google's subpoena response also included Google Pay responsive information that included multiple entries. Below are summaries of four of those entries:

Created on: 2016-05-08
 Recipient Name: Mike Cambalik
 Address Line: 3412 17th Ave
 Locality Name: Forest Grove
 Administrative Area Name: OR
 Phone number Saved to Address: +1 XXX-205-XXXX

Created on: 2023-01-13
 Recipient Name: Michael Cambalik
 Address Line: 4725 Sw 139th ave
 Address Line: 25
 Locality Name: Beaverton
 Administrative Area Name: OR
 Phone number Saved to Address: +1 XXX-205-XXXX

Created on: 2024-08-28
 Recipient Name: Michael J Cambalik
 Address Line: 4725 Sw 139th Ave
 Locality Name: Beaverton
 Administrative Area Name: OR
 Phone number Saved to Address: +1 XXX-205-XXXX

Created on: 2025-01-15

Recipient Name: Michael J Cambalik
Address Line: 4725 Southwest 139th Avenue
Address Line: Apt 15
Locality Name: Beaverton
Administrative Area Name: OR

16. Additionally, the subpoena response from Google provided IP addresses and times associated with the Google account. One of the IP addresses was 50.39.254.94 on or about December 2, 2024, and on or about February 6, 2025. Based on open-source research, IP address 50.39.254.94 was provided by Northwest Fiber, also known as Ziply Fiber. The FBI subsequently sent a subpoena to Northwest Fiber requesting information on IP address 50.39.254.94. On or about February 27, 2025, Northwest Fiber responded. Below is the information included in the response

Name: Michael Cambalik
Service Address: 4725 Southwest 139th Ave, Apt 15, Beaverton, OR 97005

17. An Oregon Department of Motor Vehicle search identified that Michael Joseph Cambalik, Date of Birth XX/XX/1982, resided at 4725 Southwest 139th Ave, Beaverton, Oregon 97005 and was the registered owner of a Toyota RAV4, License Plate Oregon 685GAW, and Vehicle Identification Number JTMEWRFV1KD514012.

18. Cambalik is a registered sex offender stemming from a 2009 attempted sexual assault of a child. He last registered as a sex offender on or about November 20, 2024 and reported 4725 Southwest 139th Ave. #15 Beaverton, Oregon as his address and XXX-205-XXXX as his phone number. On or about December 5, 2024 and on or about February 20, 2025, Beaverton Police Department (BPD) officers contacted Cambalik at his residence at 4725 SW 139th Ave. Apt 15, Beaverton, Oregon in an unrelated investigation.

19. Based on open source research, phone number XXX-205-XXXX is provided by T-Mobile, Inc. The FBI sent a subpoena to T-Mobile for phone number XXX-205-XXXX and received responsive results on or about April 1, 2025. The results stated the customer name associated with the account was Michael Cambalik.

20. On March 28, 2025, the FBI conducted physical surveillance of 4725 Southwest 139th Ave, Beaverton, Oregon and observed a Toyota RAV4 with license plate 685GAW parked in the parking lot for the apartment complex located at 4725 Southwest 139th Ave, Beaverton, Oregon.

21. On April 20, 2025, FBI video surveillance of 4725 Southwest 139th Ave, Beaverton, Oregon observed an individual matching the description of Cambalik enter what appeared to be the Toyota RAV4, License Plate 685GAW, depart the residence, and return later in the day on April 20, 2025.

Conclusion

22. Based on the foregoing, I have probable cause to believe, and I do believe, that **Michael Joseph Cambalik** committed Sexual Exploitation of a Minor, in violation of 18 U.S.C. § 2251(a), Receipt of Child Pornography in violation of 18 U.S.C. § 2252A(a)(2), and Coercion and Enticement in violation of 18 U.S.C. § 2422(b). I therefore request that the Court issue a criminal complaint and arrest warrant for **Michael Joseph Cambalik**.

23. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Pamela Paaso, and AUSA Paaso advised me that in her opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

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Request for Sealing

24. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may cause flight from prosecution, cause destruction of or tampering with evidence, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

By phone pursuant to Fed. R. Crim. P. 4.1
AARON T. EISNER
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at

9:40 a.m. on April 28, 2025.


HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge